

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
1285 AVENUE OF THE AMERICAS
TELEPHONE (212) 373-3000

NEW YORK, NEW YORK 10019-6064

UNIT 5201, FORTUNE FINANCIAL CENTER
5 DONGSANHUAN ZHONGLU
CHAOYANG DISTRICT, BEIJING 100020, CHINA
TELEPHONE (86-10) 5828-6300

HONG KONG CLUB BUILDING, 12TH FLOOR
3A CHATER ROAD, CENTRAL
HONG KONG
TELEPHONE (852) 2846-0300

ALDER CASTLE
10 NOBLE STREET
LONDON EC2V 7JU, UNITED KINGDOM
TELEPHONE (44 20) 7367 1600

FUKOKU SEIMEI BUILDING
2-2 UCHISAIWAICHO 2-CHOME
CHIYODA-KU, TOKYO 100-0011, JAPAN
TELEPHONE (81-3) 3597-8101

TORONTO-DOMINION CENTRE
77 KING STREET WEST, SUITE 3100
P.O. BOX 226
TORONTO, ONTARIO M5K 1J3
TELEPHONE (416) 504-0520

2001 K STREET, NW
WASHINGTON, DC 20006-1047
TELEPHONE (202) 223-7300

500 DELAWARE AVENUE, SUITE 200
POST OFFICE BOX 32
WILMINGTON, DE 19899-0032
TELEPHONE (302) 655-4410

WRITER'S DIRECT DIAL NUMBER

(212) 373-3248

WRITER'S DIRECT FACSIMILE

(212) 492-0248

WRITER'S DIRECT E-MAIL ADDRESS

wclareman@paulweiss.com

November 21, 2019

By ECF

The Honorable J. Paul Oetken
Southern District of New York
40 Foley Square, Room 2101
New York, NY 10007

Re: *In re Interest Rate Swaps Antitrust Litig.*, No. 16-MD-2704-JPO (S.D.N.Y.)

Dear Judge Oetken:

We write on behalf of Defendants to propose a sealing protocol for the *Daubert* opposition, *Daubert* reply, and sur-reply submissions due November 27, 2019. The submission will reference discovery materials that have been designated "confidential" or "highly confidential" by the parties and third parties, including data, documents, and deposition testimony. Pursuant to the Protective Order (Dkt. No. 300), we are obligated to file references to such material under seal. For previous filings related to class certification, the Court has permitted the parties to provisionally file their papers under seal with a deadline for the parties to agree on redactions. *See, e.g.*, Dkt. No. 522; Dkt. No. 849 ("Plaintiffs shall file their papers under seal on or before October 1, 2019, and then submit proposed redactions for Court approval on or before October 15, 2019.").

We respectfully request that the Court follow that procedure for the submissions due on November 27 and permit Defendants to file those papers under seal on November 27, and then propose redactions two weeks later, on December 11. Such a protocol will ensure the parties can propose targeted redactions that comply with Section 2.E. of the Court's Individual Practices in Civil Cases. We have discussed this request with Plaintiffs, and they do not oppose it.

Granted.
So ordered:
November 22, 2019

Respectfully submitted,

/s/ William A. Clareman

William A. Clareman


J. PAUL OETKEN
United States District Judge